

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CLEAN ENERGY CHOICE COALITION, NFP)	
)	
Plaintiff,)	
)	Case No. 1:25-cv-04353
v.)	Hon. Franklin U. Valderrama
)	
VILLAGE OF OAK PARK, ILLINOIS,)	
)	
Defendant.)	

PLAINTIFF’S MOTION FOR SUMMARY JUDGMENT

Plaintiff Clean Energy Choice Coalition, NFP (the “Coalition”), pursuant to Rule 56 of the Federal Rules of Civil Procedure and Local Rule 56.1, moves this Court to grant summary judgment in its favor on Plaintiff’s claims. In support of this Motion, Plaintiff submits the accompanying Memorandum of Law and Rule 56.1 Statement of Undisputed Facts.

The Village of Oak Park (“Oak Park”) has enacted an Ordinance that prohibits consumers from using natural-gas powered appliances in newly constructed buildings. The Coalition claims that the Ordinance is preempted by the federal Energy Policy and Conservation Act (“EPCA”), which expressly preempts laws “concerning the ... energy use” of consumer and industrial appliances, 42 U.S.C. §§ 6297(c), 6316(b)(2)(A).

The Coalition is entitled to summary judgment because the material facts are not in dispute and establish that EPCA preempts local regulations such as the Ordinance that relate to the quantity of natural gas consumed by consumer and industrial appliances.

WHEREFORE, for the reasons set forth herein and in Plaintiff’s accompanying Memorandum of Law, Plaintiff respectfully requests that the Court grant summary judgment in favor of Plaintiff, and award Plaintiff declaratory and injunctive relief.

Dated: August 27, 2025

Respectfully submitted,

**CLEAN ENERGY CHOICE
COALITION, NFP**

By: /s/ Christine E. Skoczylas

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CERTIFICATE OF SERVICE

The undersigned certifies that on August 27, 2025, the foregoing was filed electronically with the Clerk of the Court using the CM/ECF system, which sent notification of such filing to all counsel of record.

/s/ Christine E. Skoczylas _____